

EXHIBIT A

Justin Meyers

From: Coinbase Support <help@coinbase.com>
Sent: Sunday, July 23, 2023 1:02 AM
To: eyeguytyson@gmail.com
Subject: [Reply] Case #16081473

Hi Sydney,

Thanks for your patience as we look into this.

First of all, we hope that this message finds you well. We understand that you previously reported unauthorized activities on your account. Upon further investigation, our records show that on 2023-07-16 7:06 PM PDT, your account was accessed from the IP address 87.249.134.10, a VPN/Hosting IP using a Windows NT 10.0; Win64 device. The attacker was able to authenticate your account credentials as well as the 2FA codes generated from your device. Additionally, the attacker also enabled the authenticator from his device.

This indicates that the unauthorized activity in your account were potentially initiated by a third party who had access to your password, 2-step verification security codes, and your email. We believe you were a victim of a phishing attack and your credentials may have been compromised.

- On 2023-07-18 7:47 PM PDT, 9.91490107 BTC was sent to an external account at bc1qdhxrng6sm03wgl9g4n8rhecz9f3ppqv72qv4g
- On 2023-07-18 10:15 PM PDT, 0.03204187 BTC was sent to an external account at bc1qdhxrng6sm03wgl9g4n8rhecz9f3ppqv72qv4g

Next Steps:

- Please check your internet, email, or SMS history and find the URL you visited during the unauthorized activity.
- Copy and paste that URL into your reply to this email and we'll work towards taking down the site. If the phishing site was displayed as an advertisement on Google, you can also report it directly to "Google (Report Phishing Page)":https://safebrowsing.google.com/safebrowsing/report_phish/.

Unfortunately, due to the technical nature of most digital currency networks, it is impossible for us to reverse these transactions and we are unable to provide any mediation with this matter. Digital currency transactions cannot be reversed or cancelled on the blockchain. It is important to be careful, and make sure that you trust anyone you send digital currency to and allow access to your computer.

If you have not already done so, it is imperative that you report this incident to law enforcement agencies in your jurisdiction immediately including the FBI Internet Crime Complaint Center (IC3) here: <https://www.ic3.gov/complaint/default.aspx/>. Be sure to include as much detail as possible in your report and please have the law enforcement officer in charge of your report reach out to Coinbase. Coinbase is willing to offer full cooperation with all law enforcement investigations pertaining to your account's compromise.

Please note, our User Agreement specifically states that users are responsible for creating strong passwords and maintaining adequate security and control of any and all access methods and codes used to access Coinbase. Additionally, Coinbase is not responsible for any loss suffered due to compromise of account login credentials due to no fault of Coinbase.

Therefore, while we are sympathetic to your situation, Coinbase is unable to reimburse you for your loss nor are we able

to reverse these transactions.

In regards to the recovery of the remaining funds on the original account, please add one of the same payment methods (bank account and/or card number) to your new account that had been used on your original Coinbase account.

Once the payment method has been added to your new account, please reply back to this email to let us know. Once we've verified your information, we can look to transfer the balance to your new account.

Regards,

Coinbase Support



thread::0yVjK6SOB763ow0yRp0fRhI::

EXHIBIT B



Coinfirm Report

Report date: November 8, 2023

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CONTENTS

1. About Coinfirm	3
2. Scope of Work.....	4
2.1 Client.....	4
2.2 Scope of Work.....	4
2.3 About this Report.....	4
3. Findings.....	5
3.1 Assets Traced	5
3.1.1 Assets Traced Identified on Cryptocurrency Services	5
3.2 Assets Traced Identified at Addresses with No Identified Owner	10
4. Methodology	12
4.1 What is crypto asset tracking.....	12
4.2 Layering/mixing schemes	13
4.2.1 Relay or Peel Chains.....	13
4.3 Coinfirm tracking algorithm.....	14
5. Appendices.....	15
5.1 Destination of Funds Bitcoin Blockchain - Excel evidence	15
6. Disclaimer	16

1. About Coinfirm

Coinfirm is the world leader in blockchain analytics and regulatory technology ('RegTech') solutions, creating the foundation for the safe mass adoption of blockchain and cryptocurrencies. Coinfirm specializes in blockchain AML (Anti-Money Laundering) and crypto fraud investigations.

Our solution is based on the actual knowledge of crime, rule-based algorithms and crypto asset tracking technology that takes the security of blockchain and crypto financial markets to a level never seen in traditional finance. Fundamentally, it is based on three interoperable pillars:

- I. Anti-Money Laundering (Effective Prevention) – technology platform allowing institutions to verify the risk of blockchain transaction counterparties and meet regulatory requirements by using the most comprehensive AML model and world's largest blockchain attributes database.
- II. Fraud Investigations and Crime Fighting (Immediate Reaction) – world's most advanced real-time asset tracking technology, utilizing multiple tracing methods, enabling freezing funds in flight, and providing court-admissible evidence for successful litigation and asset recovery.
- III. Data Ecosystem – the network and infrastructure of data collection and data reporting, supporting 20+ blockchains. Additional incentives to report suspicious activities and allowing victims of crypto fraud from all around the world to report and claim lost funds.

Coinfirm places the most precise demarcation line between "good" and "bad" in the crypto world. The oracle of future compliance exists today.

Visit www.coinfirm.com for more details about our products and services.

2. Scope of Work

2.1 Client

This analysis was commissioned to Coinfirm by:

Name: The Law Offices of G. Martin Meyers, P.C.

Address: 35 W Main Street, Suite 106, Denville, New Jersey 07834, United States of America

further referred to as 'Client'.

2.2 Scope of Work

Before commencing the work, Coinfirm was provided by the Client with the following transactions on the Bitcoin blockchain ("*Evaluated Transactions*"). Coinfirm was requested to identify the destination of the funds of the *Evaluated Transactions*.

#	Blockchain	Transaction Hash	Destination Address	Amount (in BTC)
1	Bitcoin	74fa0f5bf7e7c9cdead598fa82c898a835031503e4bf00ea7980c06182ba3a3b	bc1qdhxrng6sm03wg119g4n8rhecz9f3ppqv72qv4g	9.91488179
2	Bitcoin	593c659dbeaba2c9f46ae7d73861f25e99b9f82f9339cf8a8805a42e8612b114	bc1qdhxrng6sm03wg119g4n8rhecz9f3ppqv72qv4g	0.03202259
TOTAL				9.94690438

Table 1 - Evaluated Transactions

2.3 About this Report

This report was prepared by one of our forensic investigators using the latest blockchain analysis technology. All of our reports are reviewed by another experienced investigator to ensure accuracy and our high standards. The report covers transactions made through 2023-10-20. All dates are in UTC time zone.

3. Findings

3.1 Assets Traced

Coinfirm has applied five different tracing methodologies -- “First In First Out”, “Last In First Out”, “Pro Rata Distribution by Blocks”, “Pro Rata Distribution by All Outputs”, and “Taint Last”. For the full tracking results, please refer to Appendix 1. All assumptions and statements in this report are based on transactions and destinations confirmed by all tracing methods.

In total we were able to identify 8.7986 Bitcoin out of 9.94690438 Bitcoin in scope. 7.77243 Bitcoin out of 9.94690438 Bitcoin could have been confirmed by all tracing methods. When the destinations are confirmed by all tracing methods, there can be a high level of confidence in the results. See Section 4 for more details on our tracing methodology.

The movement of funds has been obfuscated using relay chains, where funds are transferred multiple times and split among many destinations. This results in a large amount of transaction fees being paid and explains the difference between the amount of Bitcoin we were able to trace and the funds in scope.

3.1.1 Assets Traced Identified on Cryptocurrency Services

The Destination of Funds Tracking shows that approximately 7.12226 Bitcoin of the *Evaluated Transactions* were received by -14- identified cryptocurrency services. 6.79192 Bitcoin (“*Assets Traced*”) out of 7.12226 Bitcoin have been confirmed by all five tracing methodologies. When the destinations are confirmed by all tracing methods, there can be a high level of confidence in the results. Please refer to Section 4 for more details on our tracing methodology. For the full tracking results, refer to Appendix 1. The table below displays the information about the cryptocurrency services that received the funds at the time this report was issued:

#	Owner Name	Total Assets Traced (in USD)	Total Assets Traced (in BTC)	Assets Traced (confirmed by all methods, in USD)	Assets Traced (confirmed by all methods, in BTC)
1	Binance	158,925.53	5.32289	153,773.02	5.25660
2	Cash App	26,210.73	0.87561	26,210.73	0.87561
3	WazirX	7,788.50	0.26688	7,788.50	0.26688
4	Crypto.com	5,287.01	0.18100	5,287.01	0.18100
5	Coinbase	4,497.53	0.14885	2,309.51	0.07684
6	FixedFloat	2,231.22	0.07671	-	-
7	Shakepay	2,100.38	0.07000	2,100.38	0.07000
8	Bitget	1,109.91	0.03775	-	-
9	Bitpanda	991.19	0.03313	991.19	0.03313
10	Remitano	951.51	0.03186	951.51	0.03186
11	Bybit	928.58	0.03112	-	-

#	Owner Name	Total Assets Traced (in USD)	Total Assets Traced (in BTC)	Assets Traced (confirmed by all methods, in USD)	Assets Traced (confirmed by all methods, in BTC)
12	TradeOgre	646.84	0.02498	-	-
13	Paxful.com	296.09	0.01145	-	-
14	ChangeNOW	293.64	0.01003	-	-
TOTAL:		212,258.66	7.12226	199,411.85	6.79192

Table 2 - Assets Identified on Cryptocurrency Services (USD amounts at day of transaction)

The following chart shows the distribution of *Assets Traced* identified of Cryptocurrency Services. The table below provides transaction details for the addresses identified as recipients of the assets traced. In total, more than 95% of the funds were transferred to -4- different services:

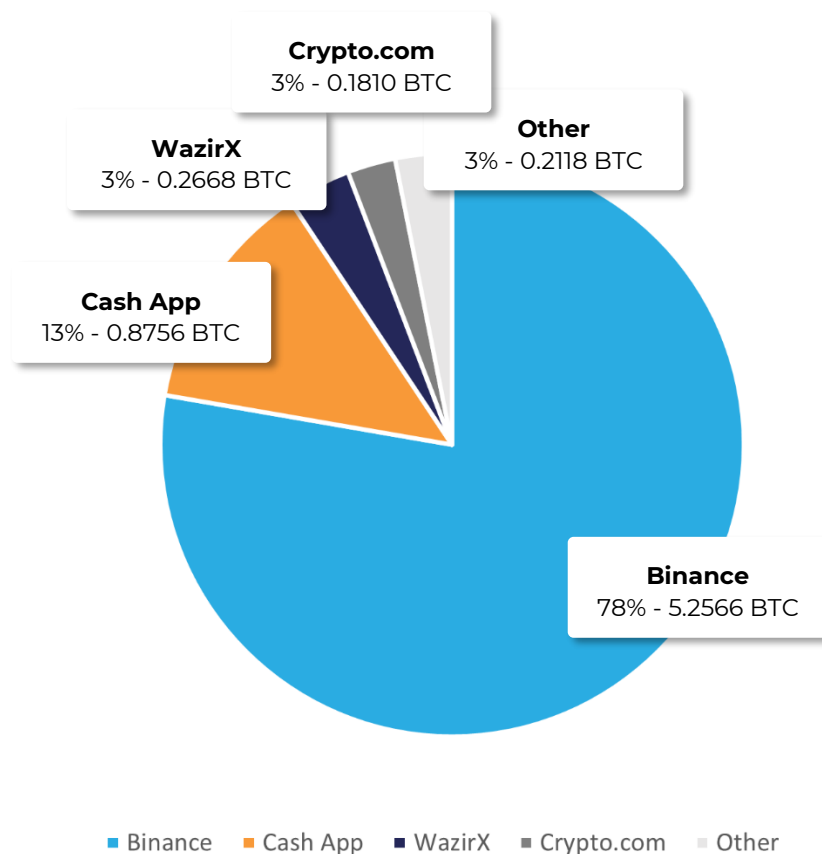


Figure 1 - Distribution of Assets Traced identified on Cryptocurrency Services

Using a so-called relay chain pattern, the perpetrators attempted to obfuscate the transaction path and increase the complexity of tracking. With each payment, a small portion of the amount is sent to a different address. This pattern is then repeated many times.

If the data has to be analyzed manually, it represents a correspondingly high and error-prone effort for the investigator. We have automatically tracked these transactions with the "Coinfirm Investigator" and were able to determine the destination addresses.

The following is a visualization of the transaction path of *Assets Traced* to Binance:

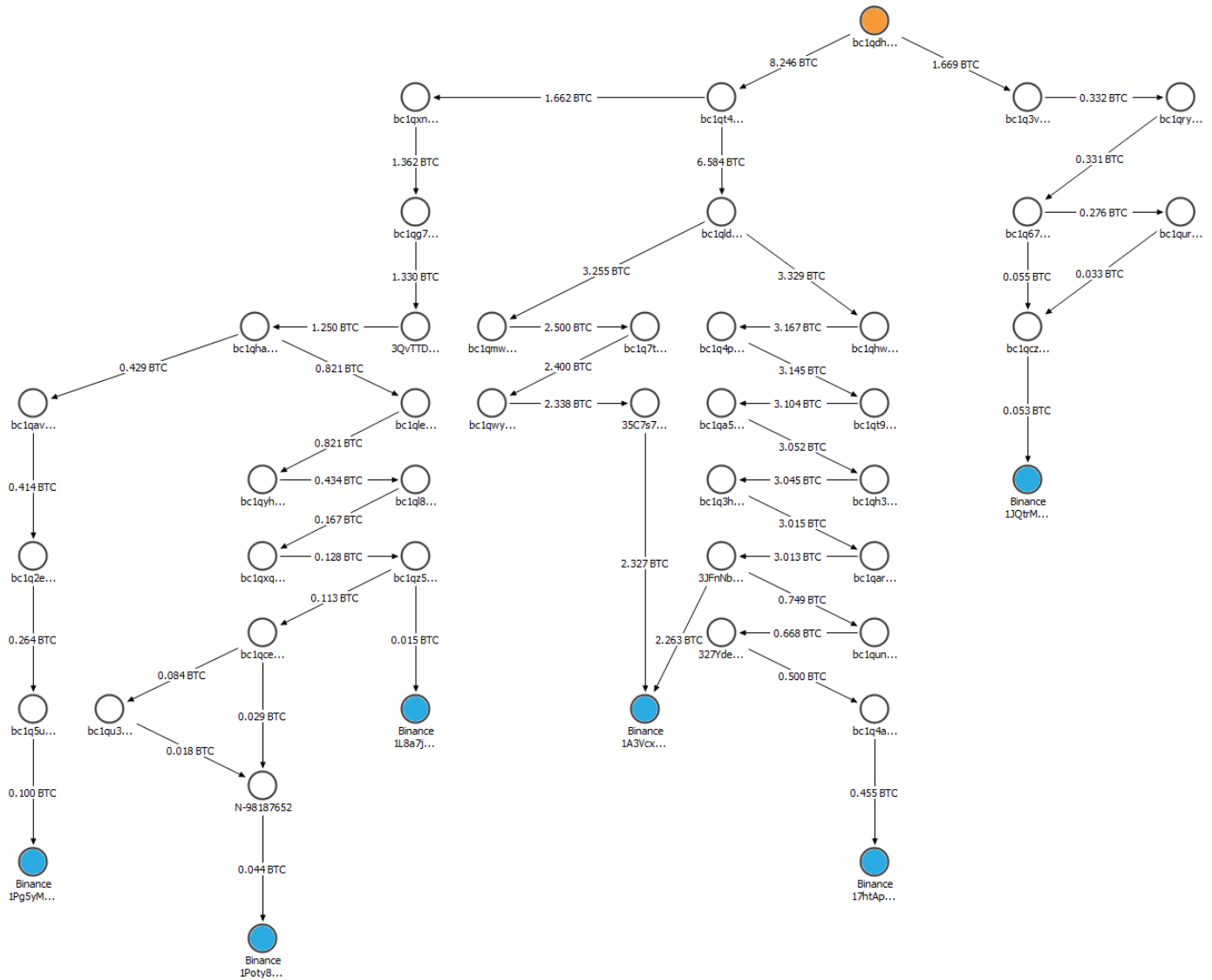


Figure 2 - Assets Traced identified on Binance

The table below presents transaction details for the addresses identified as recipients of the *Assets Traced*.

#	Owner name (Destination Address)	Destination Address	Transaction Hash	Transaction Date (UTC)	Asset Name	Total Assets Traced (per Asset Name)
1	Binance	1A3VcxK9npSwBqQCh hAZBFHnw9ofex4AG6	bb1eb2d9e2ca5921 b9cd7187bd786895 724cea2588db4e2a 0c9e23cd3af83905	2023-07-24 17:16:55	BTC	2.32663959
2	Binance	1A3VcxK9npSwBqQCh hAZBFHnw9ofex4AG6	3a515e12077cc4bf 5aa1337e21687c0f 6c22bdccacba3d92 68024a50afa2e5fa	2023-07-24 12:57:58	BTC	2.26314014

#	Owner name (Destination Address)	Destination Address	Transaction Hash	Transaction Date (UTC)	Asset Name	Total Assets Traced (per Asset Name)
3	Cash App	bc1q80e37u0qttv9dcnr6 mqyumgan9z05fch7utntz	21c1c2c353002d3c 079ce9d01a7cc932 a9529090ccea1aa6 849ad8351c606f41	2023-07-31 10:15:57	BTC	0.58953494
4	Binance	17htApt2yH4xDV1U8 CLKACutWJaguyEvph	612f3aaff5670b76 9f86be2f49b12a2f 39f9b85bac64bcc7 33376cd4a2715504	2023-08-09 13:36:44	BTC	0.45454000
5	WazirX	bc1q2mut2wq8adgra3ffd 8kfw20dg8jev3wservkmaq	2df18d8c821f1ce1 c20e5e63995e08ae d5e2289dd1e86bd3 aa4ac76bb04085f4	2023-08-12 17:45:09	BTC	0.15000000
6	Binance	1Pg5yMpRbNxphB7yp YNJvHD8DLkT1Afaod	02d6022dbc61fb18 4c0fc990851ecc17 31774b57b3be68ac 4004ba7712a46633	2023-08-12 18:21:34	BTC	0.10000000
7	Crypto.com	3MR8AbSy5mE2PEVml dhYkYkG33tJcPAekD	dbabb51cdb959c22 74fa8f70deef818a 576f97d290989ef0 78383742fa5e688a	2023-07-27 04:44:51	BTC	0.10000000
8	Crypto.com	3MR8AbSy5mE2PEVml dhYkYkG33tJcPAekD	3bef0272e1dff02c a184ab8f01209c04 039aa919cae2f9fb 36c0d14675546cf6	2023-07-24 13:50:22	BTC	0.08100000
9	Cash App	bc1qzx5y8n6d6ww0wuapn 915j55727qrz832mt1yqe	7e13523bbfaa6e71 7768b98ae747d533 e2aaad899596326d 30231ffd8903b8b6	2023-07-23 20:19:42	BTC	0.06322147
10	Coinbase	35UvYwQ1DPjVTac1p bopbaMuEz3GqALhLT	a11ee85635730806 7f0b5c221bcff290 4d8051dcdaa6fb93 75f826fbb5e9188c	2023-07-20 13:25:27	BTC	0.06184000
11	Cash App	bc1qa4w7tr5vfhd5c67ju frgwequ8s7cetfk5t82cf	deed479507afa98d 5d0cfa1df5e955fb 05124cf6ad5b7125 931c5a856d73dac0	2023-07-27 20:37:52	BTC	0.06174000
12	Binance	1JQtrMuv8YBfUyXuN fxVKSEzdCmBWArYmu	ccc3b0c15b15c913 fdfdcb64de354258 d938884d4036a4bd 8cb7ed38baab6a35	2023-07-21 12:38:55	BTC	0.05281000
13	Shakepay	bc1q4l6thyz32gj8fjcec nxad6rqd2k68qhmrnekn7 14rvsvtjap146sferghq	66eeb69e6bc4d488 5baf68c33e0933be f15afa340538e555 46a1dc7954961cf3	2023-07-20 02:18:05	BTC	0.05200000
14	Binance	1Poty8QjYdSFTqGzz jKbhgocvDV7TJ5uYB	890fcd5c4ba15515 48863667f1f7548b da1b353cdc6eb54a 7cd1c9ace7a247a7	2023-08-19 03:20:50	BTC	0.04446000
15	WazirX	bc1qgtgnf0pphzhg3a9s7 4ugs358pj2x68ugf5ggpn	224b9f6b565f190d 8a5d8b95099e0b0a c89d218a30d7ee37 5501166c3b09559a	2023-08-19 01:47:38	BTC	0.04000000
16	Cash App	bc1qujyk56p5tm0preyap 8rn88teaajwur3hhp8s7q0	342d5f8e868e62b1 087127f4793722a2 fdf142cccdeacb55 935a9948da9633d2	2023-07-21 22:49:15	BTC	0.03340000

#	Owner name (Destination Address)	Destination Address	Transaction Hash	Transaction Date (UTC)	Asset Name	Total Assets Traced (per Asset Name)
17	Bitpanda	bc1qarlsynly6xmpf40um c2whjyjn2f4w9n1prgcxu	ea22b26f8370ca34 9198cf3fe1559126 a3b727ac0fcb3d0d 0ace5a903b762368	2023-07-21 22:44:08	BTC	0.03313000
18	Remitano	3LKGWzD2kJA1EFvEe MKfExz34Nu8JvFpc	074b03d2166e2183 dc5276915ea3bd6c 029e98c541a64447 6244afeda0cc5741	2023-07-22 05:44:35	BTC	0.03186000
19	WazirX	bc1qrq4meci7sjrew952k zjudp6mfvmct5x2fextjs	ef82219beb2c1140 4eea067f25f51360 0b85b428312f7040 05b2c49fc5a788a8	2023-08-12 17:39:30	BTC	0.02737000
20	Cash App	bc1qhnnw0rz24qj0yhr4u gq9ydmkq5fq5e45mf1mlt	023672d682f6492e 2defb486d42c5f86 38ec86cc508edd11 a119274ffe1e2cbd	2023-07-20 21:24:53	BTC	0.02630000
21	Cash App	bc1qa4w7tr5vfhd5c67ju frgwequ8s7cetfk5t82cf	9db45d4023053ab0 cdd4058f008d7a6a b35cbd3b50b90566 2c7cb40695d3715b	2023-07-28 14:25:47	BTC	0.02600000
22	Cash App	bc1qtcw3v3g9mee6s1fx8 68322s1e2k9mxpvt8rkv5	c9e9232eca5e8d8b 7205a4ff94396b99 098a66a00930ac1f 1368b258a48fdaf9	2023-07-20 04:33:08	BTC	0.02329000
23	WazirX	bc1qh7evj2clmp4y5c564 hvq00122qv2psmwy3kjf0	2bf0cc264aab08ce 8763c55440b8138d ff9b4d9e2530ba20 51d2b4af19e51b24	2023-08-08 10:27:33	BTC	0.02086000
24	Cash App	bc1qa4w7tr5vfhd5c67ju frgwequ8s7cetfk5t82cf	13660f76b7b4b001 cdaa3a57d5e3c50a 9522cf45039624dc fe9941c465c53179	2023-07-28 01:40:22	BTC	0.02000000
25	Shakepay	bc1qkkwvxd5yhj36q5ac wkkt6784nyggdy1fwkmng leu0psy4mmsras7049z2	9a91b209b339e07b 9f205e7e1e5f3e1e 9492b930163743d4 d8a627ccdc7d9e8a	2023-07-20 01:07:03	BTC	0.01800000
26	Cash App	bc1qgvgr2v3qx375uc4xc 6kxp59y9r8389jy5udmx3	891c63d4d9599a5c b31cd44726649530 2db80df1f6f1026b e37351283da83d1a	2023-07-24 22:05:10	BTC	0.01713000
27	Binance	1L8a7jXWsn7ipAe5y R7HN8tZC1oDrRmNL	4ffbc9be9d320fb7 05456ba438a7c3af 8d546f6444bab84c ddbe6cd0bfd6ebcb	2023-08-19 02:35:08	BTC	0.01500000
28	Cash App	bc1qa4w7tr5vfhd5c67ju frgwequ8s7cetfk5t82cf	a46764c133f4926a e8db7926e7456b9c 1812638222d4e90c 96f8e4fb600123f2	2023-07-29 00:12:50	BTC	0.01500000
29	Coinbase	3JdwengbSiUzteSb eiHkS892p7a1gVMzV	1bb406d7a8f36df7 39b255978cca9e79 ac51132a00554a1c 47c31b9d60d176eb	2023-08-12 19:14:48	BTC	0.01500000

Table 3 - Deposit transactions for Assets Traced identified on Cryptocurrency Services

3.2 Assets Traced Identified at Addresses with No Identified Owner

The Destination of Funds Tracking shows that approximately 1.67634 Bitcoin of the *Evaluated Transactions* were received by -26- addresses with no identified owner. 0.98051 Bitcoin ("*Assets Traced*") out of 1.67634 Bitcoin have been confirmed by all five tracing methodologies. When the destinations are confirmed by all tracing methods, there can be a high level of confidence in the results. Please refer to Section 4 for more details on our tracing methodology. For the full tracking results, refer to Appendix 1. The table below displays the information about the addresses with no identified owner that received the funds at the time this report was issued:

#	Destination Address	Total Assets Traced (in USD)	Total Assets Traced (in BTC)	Assets Traced (confirmed by all methods, in USD)	Assets Traced (confirmed by all methods, in BTC)
1	bc1qcnky044usdpusdcgz kfmf9536mu4xjvsrt59s3	8,979.60	0.30000	8,979.60	0.30000
2	bc1q598qmcw3rrlgt7272 chuesxhkv18p9gnyuw67y	5,690.24	0.20432	-	-
3	bc1qa2qjycm499wq7emj8 gkle9t56dmcgh4cfj8jw2	5,597.67	0.21303	5,597.67	0.21303
4	bc1qrxxq7me25xevpad6z 19rkpudcerfdax7tpm4q4	3,746.88	0.14018	3,746.88	0.14018
5	bc1qmr4xs8eqa4nnnrys5 rh4p9ueyp02f99wzcvr4n	3,388.88	0.12907	3,388.88	0.12907
6	37PiDkgyQ165vf1jGRay2 ZxYUBPLtukLgb	2,269.27	0.07721	-	-
7	bc1q88shwpwpjkd72vwth ev7dt0xpkuuu6rguxewrv	2,011.04	0.07618	2,011.04	0.07618
8	bc1qe0xjt0zv39q5ucza pajvqnthsx946qs8hzc	1,750.61	0.05992	1,750.61	0.05992
9	bc1q0r0jk53q0yu87xfar x0ldpayhns7wc4nuk7rfs	1,632.10	0.06211	1,632.10	0.06211
10	bc1qggrldndfmgpv9kvhq tqr38yxgflzt7dpdmj6r	1,588.58	0.05446	-	-
11	bc1qf8h5k6sash8007vpe symxkw2xsg5d0r3j415vm crwpz2pqu66fjstzgd3r	1,496.97	0.05094	-	-
12	bc1q83214marwscf1q8yp ctgs22qlgmneuzws8x6u6	1,277.96	0.04889	-	-
13	bc1q2mx8y4t46uchcv5p2 dpzhm7z6fsce312dq448	828.38	0.03153	-	-
14	bc1qe9jdq5dxjmnzg603m agyesse70h6lc8gfwl1tu1	744.38	0.02900	-	-
15	bc1qmxcaqqze2n4hr5rwf lyfu35q90y22raxdgc4p	738.75	0.02445	-	-
16	bc1qhcxxy2t8nrzapvj496 5v557ersfttvj4121pl2w	659.25	0.02236	-	-
17	bc1qeq50x3wmvk3wtuqj7 fwlzkasvydh6chckfgqjh	492.76	0.01891	-	-
18	bc1qqv2r4a25rppyr7dz2 jpp42up5eu9muf8et4d4	470.73	0.01646	-	-
19	36qi58ygsBbqPGkmSUryR 47YF6UhSwhYfw	435.11	0.01522	-	-

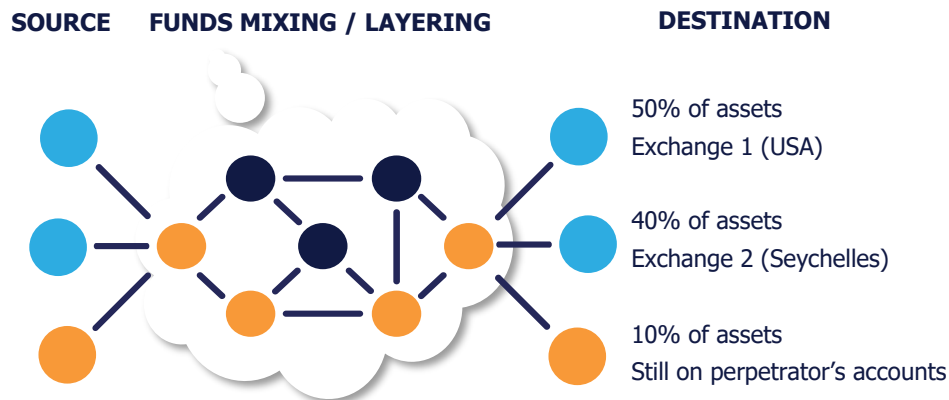
#	Destination Address	Total Assets Traced (in USD)	Total Assets Traced (in BTC)	Assets Traced (confirmed by all methods, in USD)	Assets Traced (confirmed by all methods, in BTC)
20	bc1qdf13dfnwwvlqa5jpc kh0ccwpjczh5y566c4g76	433.16	0.01591	-	-
21	bc1qvqjnvrrdel6uh6ydz np8nh8nkgwu9etzpsy7fc	431.96	0.01566	-	-
22	bc1qara4fgclkv9xy5laq h87s5awgvrmf85xv7qmts	414.17	0.01531	-	-
23	bc1qxvcfwmjcarg7c7pau t2c9z2hgmqc5r97zkz8kd	409.09	0.01542	-	-
24	bc1qd6zg7nqygssqqhwvj hdgt6maate4fqrwqg6eha	386.46	0.01457	-	-
25	bc1qk73gmjsrx046fz1g4 p946kj29luzgpw8cc426s	380.03	0.01292	-	-
26	3246hqX7b5NyfiMRdNM28 yqB5qdPpqVDzP	323.92	0.01230	-	-
TOTAL:		46,577.95	1.67634	27,106.78	0.98051

Table 4 - Assets Identified at Addresses with No Identified Owner (USD amounts at day of transaction)

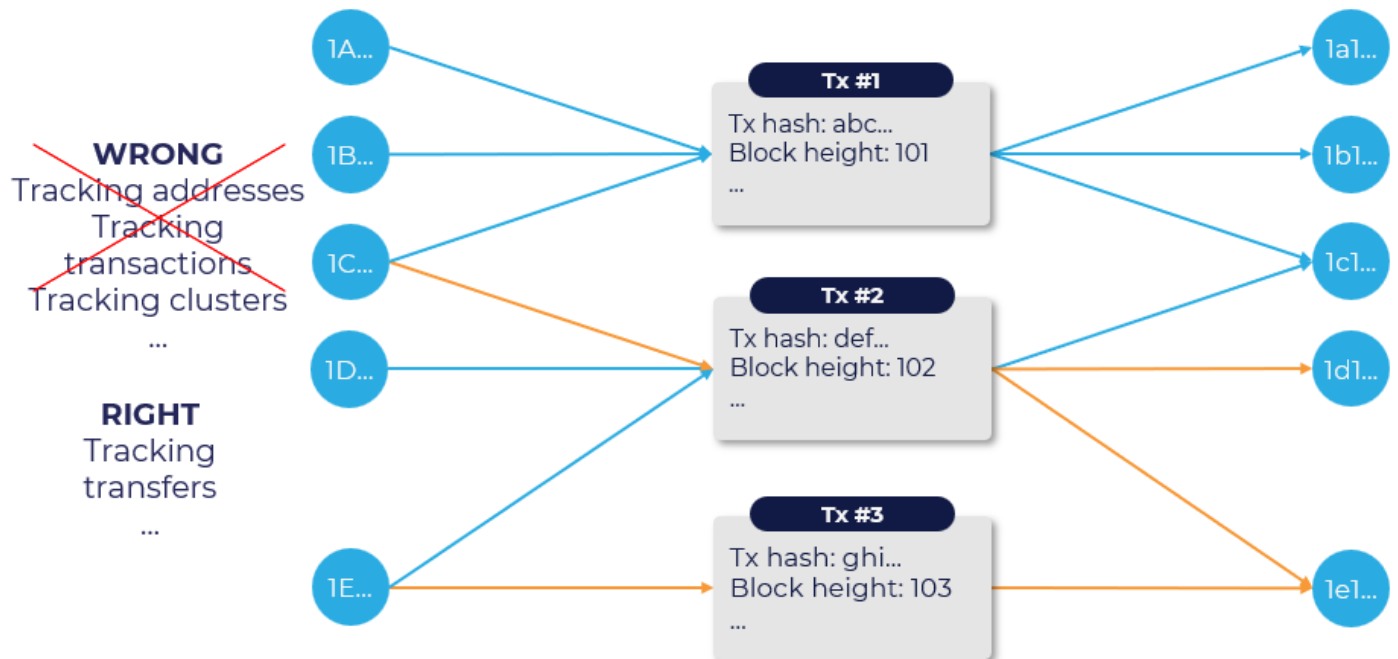
4. Methodology

4.1 What is crypto asset tracking

Crypto asset tracking means identification and evidencing the destination or source of crypto assets through the application of forensic accounting methods. Defrauded cryptocurrency funds are typically passed through complex layering/mixing schemes aimed at concealing the trail of funds.



Each asset tracking exercise starts with the provision of transfers to be traced. Unlike in traditional finance, blockchain transactions may contain several transfers of funds occurring in one transaction, where only part of them should be subject to tracing. Therefore, tracking should always be executed on the lowest level of granularity which is a transfer and not a transaction, address, or cluster.



Many blockchain analytics treat all consecutive transactions as dirty or tainted funds using 'click-through graph tools' (the so-called 'Poison' method). Poison method is not considered a forensic accounting method by many witness experts as it does not follow the rules of professional accounting and neglects the chronology of transactions. It does not distinguish between illicit and clean funds.

4.2 Layering/mixing schemes

One of the methods aiming to conceal the trail of funds is usage of blockchain transactions mixers (also referred to as ‘tumblers’/‘anonymizers’), which are services that attempt to confuse the trail of blockchain transactions. In most cases funds are divided into smaller portions and are subsequently mixed at random with similarly sized portions of a number or ‘pool’ of other users’ funds. As a result, the perpetrator receives their funds back with a significantly lower ‘taint’ ratio (low traceability to the perpetrator’s initial blockchain addresses). Some blockchain protocols like Dash or Zcash have embedded anonymizing functions and are widely referred to as ‘privacy coins’ in the blockchain industry. According to existing regulations (e.g., 5th AML Directive of the EU) running a mixing service may be illegal, and the targeted enforcement of these regulations has led some VASPs to delist some privacy coins.

Mixing services are of most benefit to malicious actors if the amount of illicit funds is not extraordinarily large. The higher the amount, the more difficult it is to conceal the source of funds. Therefore, large operations tend to pass funds through a deliberately designed chain of hundreds or thousands of layering transactions.

The destination of illicit funds are typically VASPs, often those with no or low KYC standards as well as reputable ones, as most of them are still missing truly effective, high-tech AML and Transaction Monitoring solutions like Coinfirm’s AML Platform. The other type of usual recipients of defrauded coins are various Clearnet and Deep Web blockchain services, such as marketplaces, decentralized finance applications or gaming and gambling sites. All these endpoints may serve criminals both to cash out illicit cryptocurrencies as well as a means of further hindering the trail of funds by exchanging them through several such services.

4.2.1 Relay or Peel Chains

A “relay or peel chain” occurs when a certain amount of coins/tokens is sent from one address through a series of transactions in which a slightly smaller amount of coins/tokens is transferred to a new address each time. In each transaction, some quantity of coins/tokens “peel off” the chain to another address. This is repeated multiple times.

4.3 Coinfirm tracking algorithm

Coinfirm algorithm can trace crypto assets through the mixing transactions (e.g., CoinJoin) and provide the full evidence of the perpetrator activity. However, there are services that, without having the access to the internal servers, make it impossible to trace the specific individuals who used them. Examples of such services are ChipMixer and Tornado Cash. Both are designed in a way that the full crypto flow path of the specific individual is not visible on the blockchain and the assets withdrawal from the mixer can often appear on the address completely unrelated to the input address. Coinfirm can further trace coins mixed through such services and presented their Destination, however, the 'current' owner of such coins may no longer be the 'initial' perpetrator, but an individual who also deposited coins into the same mixing (anonymization) service. In such case, we provide evidence of the coins being "the same defrauded property" - what it means is that other users, of the same mixing service that was used by the 'initial' perpetrator, received coins originating from the fraudulent activity (mixer transferred coins from 'initial' perpetrator to the wallet of another mixer user).

Whether traced funds are received by a VASP-controlled wallet or not has an impact on our tracing analysis. Tracing of the Claimant's cryptocurrency will continue until either those funds are received by a VASP-controlled wallet, or the funds are received by a wallet that still currently holds those funds (i.e. there has been no further onward dissipation of the funds).

Most VASPs operate pooling addresses used to store customer deposits and to execute transfers. When a user of the VASP wishes to transfer cryptocurrency from their exchange account, often the exchange will use cryptocurrency held in one of its pooling addresses to settle the transaction, rather than transfer cryptocurrency held in a wallet that only includes that specific user's cryptocurrency. In these cases, the records matching user account transactions to the movements on the blockchain showing which addresses have been used to settle the transaction are kept only by the exchange. These internal records are not publicly available. The tracing of the Claimant's cryptocurrency must, therefore, stop once those funds are received by a wallet controlled by an exchange as we do not know which user account transactions relate to transfers from these wallets.

5. Appendices

5.1 Destination of Funds Bitcoin Blockchain - Excel evidence

“Appendix 1. Destination-of-Funds BTC” - Microsoft Excel spreadsheet attached.

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